

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
WILKES-BARRE DIVISION**

IN RE:	:	
PETER NICHOLAS DECONZO	:	
DONNA C. DECONZO	:	Case No.: 5:19-bk-01904-RNO
<b><u>Debtor(s)</u></b>	:	
	:	Chapter 13
AMERICAN HONDA FINANCE	:	
CORPORATION	:	
<b><u>Movant</u></b>	:	
	:	
v.	:	
	:	
PETER NICHOLAS DECONZO	:	
DONNA C. DECONZO	:	
<b><u>Respondent(s)</u></b>	:	
	:	
CHARLES J. DEHART, III	:	
<b><u>Trustee</u></b>	:	

**DEBTORS' RESPONSE TO MOTION FOR  
RELIEF FROM STAY**

And now come the Debtors, PND and DCD, by and through their undersigned counsel, and hereby respond to the Motion for Relief as follows:

1-4C. Admitted

4.D. Denied as stated, While it is admitted that the Debtors' account became delinquent, the Debtors have made payments not credited in said Motion. Accordingly Paragraph 4D is denied as stated and strict proof thereof is demanded at time of hearing.

5. Admitted in part and denied in part. While it is admitted that the Movant is requesting relief as alleged, it is denied that the Debtors have failed to make all the payments as alleged. Furthermore, with respect to the payments that are outstanding, the Debtors are willing to pay the same either through the terms of a stipulation with Movant or through an amendment to their Chapter 13 Plan.

6-8C. Admitted.

8.D. Denied as stated, While it is admitted that the Debtors' account became delinquent, the Debtors have made payments not credited in said Motion. Accordingly Paragraph 8D is denied as stated and strict proof thereof is demanded at time of hearing.

9. Admitted in part and denied in part. While it is admitted that the Movant is requesting relief as alleged, it is denied that the Debtors have failed to make all the payments as alleged. Furthermore, with respect to the payments that are outstanding, the Debtors are willing to pay the same either through the terms of a stipulation with Movant or through an amendment to their Chapter 13 Plan.

Wherefore, Debtors pray that the Motion be denied, that they be given an opportunity to provide adequate protection as offered, and for such other relief as is just and equitable.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ronald V. Santora', with a stylized, cursive script.

Ronald V. Santora, Esq.